



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JJD:LTG/JLG
F. #2018R00279

*610 Federal Plaza
Central Islip, New York 11722*

August 26, 2019

By Federal Express and ECF

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Re: United States v. Christopher McPartland and Thomas J. Spota
Criminal Docket No. 17-587 (JMA)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

The enclosed hard-drive is being produced pursuant to the terms of the parties' March 19, 2019 Stipulation and Order (the "Protective Order"). The materials contained herein were provided to the government by the Suffolk County District Attorney's Office ("SCDAO"), and were purported to be the imaged hard-dives of the computers used by Thomas Spota, Christopher McPartland, and [REDACTED] during their tenure at the SCDAO.¹ The materials have been stamped with control numbers SCDA_HD 000000001 through SCDA_HD 000195934.

¹ Any materials that may be subject to the attorney-client privilege with respect to any of these individuals have been segregated, for further review by a taint team. If and

These materials are being provided to you directly via a third party data hosting and processing company. Additional materials – in particular, those materials that are subsequently deemed not privileged – will be provided on a rolling basis, as they become available.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
John J. Durham
Lara Treinis Gatz
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Enclosure.

cc: Clerk of the Court (JMA) (by ECF) (*redacted*) (without enclosure)

when such materials are deemed non-privileged, they will be produced on a rolling basis as that determination is made.